



## **Dublin Chamber Submission to Dublin City Council on its Draft Climate Change Action Plan 2019-2024**

**March 2019**

*Dublin Chamber welcomes the Dublin City Council Draft Climate Change Action Plan, the partnership across all four Dublin local authorities, the foundation of the Dublin Metropolitan Climate Action Regional Office and the focus on city resilience. However, the Chamber is concerned at the lack of clear deadlines for implementation when considering the 5 year timeline of the Draft Plan, especially in relation to transport infrastructure projects. Also, the Draft Plan does not fully consider engagement or inclusion of the business community, or recognise the role that the business community can play in transitioning Dublin businesses and their employees to more environmentally sustainable practices.*

### **Introduction**

Dublin Chamber is the largest Chamber of Commerce in Ireland, representing 1,300 businesses from across the Greater Dublin Area.

Dublin Chamber broadly welcomes the publication of the Dublin City Council Draft Climate Change Action Plan and its holistic approach to sustainability and city resilience, and welcomes the foundation of the Dublin Metropolitan Climate Action Regional Office as a body charged with its implementation. We welcome the focus on public transport as an area where improvements can have an immediate impact on reducing harmful emissions in the City. We also commend the Council for its acknowledgement that climate change is an economic issue and the inclusion of overall city resilience as a theme. However, we are concerned at the apparent lack of definite timelines for actions, in relation to public transport and cycling infrastructure in particular. We also are concerned that there does not appear to be any clear plans to include and collaborate with Dublin's business community, despite references to an aim of engaging citizens in the process of becoming more environmentally sustainable, and to the economic importance of environmental sustainability and city resilience.

The Draft Plan does not state how it proposes to provide for meaningful interaction, buy-in or cooperation with the business community to make the city sustainable and resilient into the future. Considering that transition to more environmentally sustainable practices is proven to be most

successful in a ‘top down’, leader driven approach, this may be an oversight.<sup>1</sup> Dublin City Council is in a leadership role and could enable and encourage Dublin’s business leadership to engage with environmental sustainability as a business priority, and not merely as an optional ‘add-on’ as has been the case in the past, for both the business community and for local and central Government.

Dublin Chamber has been at the forefront of driving the green agenda within the Dublin business community for many years. The ‘green agenda’ was something the organisation was heavily involved in and an area in which a knowledge and leadership role was being developed until the economy crashed. With the economy having recovered from the steep economic downturn, during which the focus on sustainability was placed on hold or dropped by many companies, Dublin Chamber is again focused on playing a leadership role within the Dublin business community when it comes to sustainability and reacting to climate change.

Dublin, its Local Government, business community and citizens, cannot afford to let environmental sustainability be dropped as a priority again.<sup>2</sup> It is vital, therefore, that all parties, including Government, both local and national, the business community and citizens, work cohesively together over the coming years.

## Context

The National Planning Framework (NPF), Ireland 2040, launched in February 2018, outlines in its environmental and sustainability goals a focus on resource efficiency and a transition to a low carbon economy. The NPF sets targets out to 2050 that directly apply to Dublin as Ireland’s capital and largest urban region. It is a national objective for Ireland to transition to a low carbon economy, and this includes “*an aggregate reduction in carbon dioxide (CO<sub>2</sub>) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors*”.<sup>3</sup>

The UN warned in October 2018 that we have just 12 years to make the changes necessary to keep climate change from rising 1.5C above pre-industrial levels, a level detrimental to the planet.<sup>4</sup> It is clear from this warning that real action needs to be taken at all levels of Government as well as by the business community with a sense of urgency and with tangible deadlines. These need to extend beyond the five year electoral cycle in order for the city to play its part in the country’s overall sustainability

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<sup>1</sup> MIT Sloan Management Review – How to become a Sustainable Company. 2012.

[https://www.hbs.edu/faculty/Publication%20Files/SMR\\_Article\\_EcclesMillerSerafeim\\_77d4247b-d715-447d-8e79-74a6ec893f40.pdf](https://www.hbs.edu/faculty/Publication%20Files/SMR_Article_EcclesMillerSerafeim_77d4247b-d715-447d-8e79-74a6ec893f40.pdf)

<sup>2</sup> Dublin Chamber Green Economy. Business Ireland. 2013

<file:///C:/Users/SineadHealy/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/JDSUQBHV/Business%20Ireland%20Magazine%20March%20Edition.pdf>

<sup>3</sup> NPF <http://npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf> p119

<sup>4</sup> UN IPCC <https://www.ipcc.ch/sr15/chapter/summary-for-policy-makers/>

goals, which are set in accordance with Ireland's membership of both the UN and EU. Currently, Ireland is not meeting its renewable energy targets.<sup>5</sup>

In February of this year, Governor of the Central Bank Professor Philip Lane gave a warning to Irish business about the inevitable impact of climate change, arguing that the Irish economy and Irish business needs to be aware of and plan for the imminent and inevitable change to a low carbon economy.<sup>6</sup>

The timeline of the Dublin City Council draft Climate Action Plan is out to 2024, a five year cycle. If meaningful change is to be achieved in the lifetime of this plan it needs to take action decisively and for immediate impact. The plan needs to contribute to reducing emissions within the 12 year warning period set by the UN as well as to contribute to the long term sustainability of resources and city resilience. Furthermore, it would be advisable for the Draft Plan to include indicative actions beyond the five year cycle and lay the foundations for further actions.

The Draft Plan acknowledges past successful projects but lacks ambition in setting out future actions that can have a real impact on making Dublin a more environmentally sustainable and resilient city and to combating climate change, both of which are the expressed aims of the Draft Plan.

## **Transport**

The Department of Communications, Climate Action & Environment's National Mitigation Plan earmarks agriculture and transport as the sectors accounting for the largest contributions to emissions.<sup>7</sup> As the State's capital and most densely populated area, Dublin has the opportunity to significantly reduce its contribution to emissions through making improvements to its public transport offering and infrastructure. We commend the emphasis in the Draft Plan on looking to public transport and cycling in particular as areas for action. While the Draft Climate Action Plan targets public transport improvements, including BusConnects, expansion of Dublin Bikes (and other bike schemes soon to enter the Dublin market) and improvement of cycling infrastructure generally, Dublin Chamber is of the view that this could be done with greater urgency.

In order for any real reduction in CO2 emissions to take place, public transport infrastructure must be improved. Public transport improvements are one of the key areas in which Dublin City Council can effect significant change in a timely manner and which can result in a reduction in emission-producing behaviours by its citizens.

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<sup>5</sup> Independent.ie Feb 2019 <https://www.independent.ie/business/irish/power-play-ireland-left-facing-huge-bill-for-failing-to-hit-eu-targets-on-renewables-37857526.html>

<sup>6</sup> Central Bank Governor Issues Warning Over Climate Change Impact RTE Feb 2019 <https://www.rte.ie/news/2019/0205/1027737-climate-change-philip-lane/>

<sup>7</sup> Department of Communications, Climate Action & Environment's National Mitigation Plan 2017 <https://www.dccae.gov.ie/documents/National%20Mitigation%20Plan%202017.pdf> p20

A recent Dublin Chamber Survey showed that 60% of our members drive to work. In order to change this, improvements need to be made to the public transport system and to cycling infrastructure. Commencing constructions on BusConnects and MetroLink projects will be key in the short to medium term.<sup>8</sup> While delivering MetroLink in the timeframe set by the Draft Plan is not realistic, the delivery of BusConnects is. The Chamber has voiced its views on the proposed BusConnects plan through the public consultation process, clearly outlining its support for BusConnects, if appropriate refinements to the plan are made.<sup>9</sup> Local representatives have a valuable role to play in supporting the roll-out of BusConnects by engaging with the consultation and planning process in a constructive and positive manner.

Similarly, it is essential that Dublin takes advantage of emerging technology that improves the energy efficiency of daily commutes. The Draft Plan should ensure that new, smarter transport technology is catered for when it offers a means of reducing congestion and emissions. For example, in recent years, there has been a proliferation of e-scooter usage in European and US cities. Dublin has the opportunity to put the necessary rules and regulations in place for such technology to make a similarly positive addition to the city by reducing car usage. Dublin Chamber made a submission to the Minister for Transport in December 2018 in reference to e-scooter use in the City.<sup>10</sup> In a broader sense, the case of e-scooters exemplifies the need for Government to look at newer technologies in transport as opportunities to improve the city transport offering rather than as problems that need to be prevented.

Cycling infrastructure is being improved in the city, but at far too slow a pace. While we welcome the commitment to improving cycling infrastructure and the initiatives for segregated cycleways, e.g. the Sutton-to-Sandymount Cycleway, Dodder Greenway, Royal and Grand Canal Cycleways and the Clontarf-to-City Centre Cycle Scheme, it is clear that the cycling infrastructure in the city centre is not improving to a level and at a pace that improves safety sufficiently to encourage greater numbers of cyclists.<sup>11</sup> A prime example of this is the Fitzwilliam Cycleway that has only recently received the necessary planning permission for a segregated cycle lane.<sup>12</sup> This project was actively supported by Dublin Chamber.<sup>13</sup> Dublin Chamber is linked up with Dublin Cycling Works, a campaign for improved infrastructure with more than 90 firms signed up, a clear indication of the support that such changes have among the business community.

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<sup>8</sup> Dublin Chamber Survey December 2018

<sup>9</sup> Dublin Chamber Submission in response to 'Dublin Area Bus Network Redesign Public Consultation. September 2018 <http://www.dublinchamber.ie/DublinChamberofCommerce/media/banners/Dublin-Chamber-BusConnects-Submission.pdf>

<sup>10</sup> Dublin Chamber Submission to Department of Transport on use of E-Scooters. December 2018 <http://www.dublinchamber.ie/DublinChamberofCommerce/media/banners/Dublin-Chamber-E-Scooters-Submission-Dec-2018.pdf>

<sup>11</sup> Draft Climate Action Plan p68

<sup>12</sup> Independent.ie <https://www.independent.ie/life/city-cycling/three-major-cycleway-projects-will-begin-construction-in-dublin-city-centre-this-year-costing-an-estimated-35m-37857570.html>

<sup>13</sup> Dublin Chamber Submission re Fitzwilliam Cycle Lane. October 2018 <http://www.dublinchamber.ie/DublinChamberofCommerce/media/Policy-Documents/Fitzwilliam-Cycle-Route-Submission-October-2018.pdf>

The fact that progress on this relatively small piece of city centre infrastructure took over 8 months, notwithstanding an awareness that segregated cycle ways are the safest and most efficient model for pedestrians, cyclists and motorists alike, does not bode well for the likelihood of the Draft Plan succeeding in making meaningful strides toward enabling more environmentally friendly behaviours in Dublin City with expediency.

Dublin Bikes is recognised as a successful scheme for the city.<sup>14</sup> It has potential for greater rollout across Dublin, with widespread utilisation and further success likely in this event. The Draft Plan acknowledges the success of the Dublin Bikes project and refers to the possibility of rolling it out further; however, it does not include information on the scale of roll out.<sup>15</sup> Considering the 5 year timeline of the plan, this is a concern.

## **Resources**

The supply of water to the Greater Dublin Area is a significant concern but the precariousness of the water supply to the city is not adequately detailed in the Draft Plan.<sup>16</sup> In order to improve the city's resilience and sustainability, its natural resources, particularly water, need to be secure. We acknowledge that the proposed Eastern and Midlands Region Water Supply Project, which would involve piping water from the Shannon to the GDA and the midlands, is a national infrastructure project and dependent on a national piece of legislation, the Water Environment (Abstraction) Bill. However, considering the Draft Plan's emphasis on city resilience, it should make reference to security of water supply in light of the precarious situation at present.

## **Business Community**

Dublin Chamber believes that the Draft Plan does not consider the role of the business community in a meaningful way. The business community has exhibited the ability to act in a leadership role in this area and Dublin Chamber is of the view that the Draft Plan should include plans for business engagement. Large employers in the city such as Accenture<sup>17</sup> and Kingspan<sup>18</sup> have both shown what can be achieved in making systemic changes toward sustainability through strong leadership. They serve as examples of how this can be done by businesses acting as drivers of change within a specific sector or by imparting more environmentally sustainable habits on staff and changing general business practices to reduce carbon footprint. Similarly, climate change and renewables are of increasing importance to FDI companies, for example in the area of requiring renewable energy sources. Many FDI companies are

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<sup>14</sup> Irishtimes.com 2016 <https://www.irishtimes.com/news/health/dublinbikes-a-runaway-cycling-success-in-the-capital-1.2606304>

<sup>15</sup> Draft Climate Action Plan p69

<sup>16</sup> Draft Climate Change Action Plan p95

<sup>17</sup> Accenture <https://www.accenture.com/ie-en/company-environment>

<sup>18</sup> Kingspan <https://www.kingspan.com/group/net-zero-energy>

leading the way globally in establishing sustainable activities and can contribute to the overall transition toward sustainable practices.

The Draft Plan should take into account the positive impact that the business community can have in reducing carbon emissions and transitioning to more sustainable practices. For example, it should consider the part that the business community can play by making arrangements with its staff in support of city objectives to reduce transport emissions

The business community is part of the city and contributes to the city's emissions. However many businesses are unsure of how to make changes to become more energy efficient or environmentally sustainable. A recent Dublin Chamber survey showed 23% felt they would like to make changes to become more environmentally sustainable but they did not know how. The same survey showed that 69% of businesses feel they do not get enough guidance/support in this area from Government.<sup>19</sup>

Furthermore, inclusion of business community engagement in the Draft Plan would reinforce the need for all stakeholders to prioritise environmental sustainability.

## **Conclusion**

The Draft Plan exhibits a welcome level of leadership from Dublin City Council, with one of the targets of the plan being to '*Actively engage and inform our citizens on climate change*'.<sup>20</sup> However, considering the proven importance of leadership and a top down approach, greater collaboration with Dublin's business community, as significant stakeholders in the city, has the potential to increase the success of the Draft Plan in engaging all of its citizens. Environmental sustainability and city resilience need to be considered as a priority both for city government and for the business community. Inclusion of the business community in the Draft Plan will reinforce this.

Dublin Chamber recommends that the Draft Plan should include targets to engage with and include the business community as an essential stakeholder in reducing emission-producing behaviours in those who work in the city and to encourage prioritisation of more environmentally sustainable business practices. The Draft Plan should take the opportunity to encourage collaboration between representative bodies like Dublin Chamber and State agencies in the space. It should include a provision to provide further access points to training and information for SMEs on how to become more energy efficient and environmentally sustainable. While SEAI has established an SME Engagement Unit it remains apparent that Dublin's businesses needs further general guidance and support in their transition toward more sustainable practices.

Immediate action is necessary to transition to a low carbon economy, considering the warning of the UN. Dublin Chamber recommends the hastening of improvements to city cycling infrastructure and the

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<sup>19</sup> Dublin Chamber Business Outlook Survey Q1 2019 [http://www.dublinchamber.ie/business-agenda/business-trend-survey/business-trends-survey-q1-2019-\(1\)](http://www.dublinchamber.ie/business-agenda/business-trend-survey/business-trends-survey-q1-2019-(1))

<sup>20</sup> Draft Climate Change Action Plan p6

further roll out of Dublin Bikes as steps that should be afforded immediate action as they will have both an immediate impact on emissions and long term implications for emission-reducing behaviours.

**Broadly speaking timelines and actions in the plan are too vague and the Draft Plan lacks a step-by-step breakdown. Considering the short timeline of the Draft Plan, the actions that can be taken to encourage behavioural change and reduce emissions in transport in particular must be progressed with urgency.**